

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Koppers, Inc., Galesburg Division
1291 Illinois Route 41
Galesburg, IL 61401**

ATTENTION:

**Jim Evans
Plant Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Koppers, Inc. ("Koppers" or "you") to submit certain information about the facility at 1291 Illinois Route 41, Galesburg, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendices B and C specify the information that you must submit. You must send this information to us according to the schedules in Appendices B and C.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Koppers owns and operates an emission source at the Galesburg, Illinois facility ("Facility"). We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan.

Koppers must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Koppers must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix D, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix D provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Koppers to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Vicky Mei at 312-353-2054 or Dakota Prentice at 312-886-6761.

Date

2/27/19

Edward Nam

Director

Air and Radiation Division

[This page intentionally left blank]

Appendix A

When providing the information requested in Appendices B and C, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendices B and C.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive, or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix D for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

Appendix B

Information You Are Required to Submit to EPA - Performance Testing

Koppers, Inc. ("Koppers") must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), in accordance with the schedule below:

Submit Testing Protocol(s)	Within 45 days of receipt of this request
Notification of Intent to Test	Not less than 21 days before testing
Complete Testing	Within 80 days of receipt of this request
Submit Testing Report	Within 30 days of completion of testing

1. Within 80 days after the receipt of this request, Koppers must perform the following emission test at its facility located at 1291 Illinois Route 41, Galesburg, Illinois ("Facility"):
 - a. At the condenser, quantify the control efficiency for volatile organic materials (VOMs) and the mass emission rates of VOMs, as total VOMs, and each individual hazardous air pollutant (HAP). The mass emission rates shall be determined by performing testing using combinations of the following EPA Reference Methods (or other methods subject to EPA approval): Methods 1-4, Method 207, Method 18, Method 25/25A, and Method 320.
 - b. At the Venturi scrubber (VS) and biological air system (BAS), quantify the control efficiency of VOMs across both units and the mass emission rates of VOMs, as total VOMs, and each individual HAP from the BAS. The mass emission rates shall be determined by performing testing using combinations of the following EPA Reference Methods (or other methods subject to EPA approval): Methods 1-4, Method 207, Method 18, Method 25/25A, and Method 320.
2. During the testing conducted pursuant to Item 1 above, Koppers shall ensure that the pressure relief valves (PRVs) at the facility's work tanks are not actively venting to the atmosphere. If Koppers is not able to ensure that the PRVs will not actively vent to the atmosphere during this testing, Koppers must quantify the mass emission rates of VOMs, as total VOMs, and each individual HAP from each PRV concurrently with the testing in Item 1 above. The mass emission rates shall then be determined by performing testing using combinations of the following EPA Reference Methods (or other methods subject to EPA approval): Methods 1-4, Method 207, Method 18, Method 25/25A, and Method 320.
3. During the testing conducted pursuant to Item 1 (and if applicable, Item 2) above, Koppers shall operate all three of the Facility's creosote wood treatment cylinders at the normal production rates and concentrations of creosote per cubic foot of treated wood set

forth in the testing protocol submitted in accordance with Item 8 and any comments provided by EPA.

4. During the testing conducted pursuant to Item 1 (and if applicable, Item 2) above, Koppers shall use untreated wood ties of the wood species normal to the Facility and prepared under typical conditioning procedures normal to the Facility.
5. During the testing conducted pursuant to Item 1 (and if applicable, Item 2) above, Koppers shall operate both the Facility's VS and BAS with water recirculated for use from at least one prior full production day's operation of the VS and BAS, or water recirculated for use for the last production batch before the change-out with fresh replacement water in the VS and BAS consistent with a two-day change-out cycle.
6. During the testing conducted pursuant to Item 1 (and if applicable, Item 2) above, Koppers shall monitor and record the operating parameters for each relevant process unit and piece of air pollution control equipment at the Facility.
7. During the testing conducted pursuant to Item 1 above, Koppers shall monitor the PRVs on the work tanks at the Facility. Koppers shall note the time and duration of any PRV releases.
8. Within 45 days after receipt of this request, Koppers shall submit to EPA the proposed testing protocol(s) that completely describes the methods and procedures for testing at each unit at the Facility, including, but not limited to, raw material details (such as quantity, size, moisture percentage, conditioning, wood species, etc.), charge details (such as borate and creosote per cubic feet concentration, treatment hours, treatment method, etc.) and all relevant operating parameters of each relevant process unit and piece of air pollution control equipment at the Facility. The protocol shall address the requirements of Item 1 through Item 7 of this information request. You may submit the protocol by email. EPA will approve or provide comments on the testing protocol as expeditiously as possible.
9. Within 80 days after receipt of this request, Koppers shall conduct the testing consistent with the approved testing protocol and any comments provided by EPA.
10. At least 21 days prior to the planned test date, Koppers shall submit notification to EPA of its intent to perform emission testing. You may submit this notice by e-mail.
11. Within 30 days after completion of the test required by this information request, Koppers shall submit a complete report of the emissions testing on its facility, including, at a minimum, the following:
 - a. Summary of Results
 - i. Results of the above specified emission test:
 1. VOM results in pounds of total VOMs per hour, and pounds of total VOMs per cubic feet of creosote treated tie produced,

2. HAP results in pounds of individual and total HAP per hour, and pounds of individual and total HAP per cubic feet of creosote treated tie produced, and
 3. Control efficiencies of VOMs across both the VS and BAS together and across the condenser.
 - ii. Charge reports for each cylinder, including:
 1. Charge details,
 2. Item details,
 3. Treatment details,
 4. Borate tank readings,
 5. Treatment tank readings,
 6. RSTrendX graph, and
 7. Treating report certification signature.
 - iii. Discussion of response factors, molecular weight corrections, or any other factors used to convert raw data into the reported results (including a definition of any terms such as "response factor" that can be used to describe multiple types of corrections);
 - iv. Process and control equipment data related to determining compliance;
 - v. Discussion of test errors, including time and duration of any PRV releases;
 - vi. Discussion of any deviations from the reference test methods;
- b. Facility Operations
- i. Description of the process and control equipment in operation;
 - ii. Description of the conditioning/drying process of the untreated ties used for the test;
 - iii. Description of and charge reports for the prior production batches that used the same recirculated water used at the time of the test;
 - iv. Operating parameters of the process units, scrubber, and related equipment at the time of the test; and
 - v. Facility operating parameters that demonstrate that the process units were operated at the normal production rates and concentrations of creosote per cubic foot of treated wood at the time of the test.
- c. Sampling and Analytical Procedures
- i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/ quality assurance procedures, tests, and results.
- d. Appendix

- i. Complete results with example calculations;
- ii. Raw field data (original, not computer printouts);
- iii. Laboratory report, with signed chain-of-custody forms;
- iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
- vi. Test log;
- vii. Project participants and titles; and
- viii. Related correspondence.

Appendix C

Information You Are Required to Submit to EPA - General Information

Koppers, Inc. ("Koppers") must submit the following information to us pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days after your receipt of this request.

1. Provide a copy of all CAA permit applications submitted to the Illinois Environmental Protection Agency ("Illinois EPA") for the Koppers facility located at 1291 Illinois Route 41, Galesburg, Illinois ("Facility") since January 2008.
2. Provide a process flow diagram for the Facility, including the Venturi scrubber (VS), the biological air system (BAS), and all other equipment utilized during production and a description of its purpose.
3. Provide potential-to-emit calculations for volatile organic materials (VOMs), and individual and total hazardous air pollutants (HAPs) for each emission point at the Facility. This shall include, but not be limited to: the creosote work tank relief vents, the creosote treating cylinders, the condenser vent, the VS, and the BAS.
4. Provide copies of all annual emissions reports submitted to Illinois EPA and/or the Toxic Release Inventory Program for the Facility from January 2014 to the present, and include:
 - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used; and
 - b. Any documents outlining procedures for calculating annual emissions.
5. Provide a list of all emissions tests conducted at the Facility from January 2009 to the present for each emission point for any reason and provide copies of all the respective emissions test reports. If the most recent emissions test for any emission point was conducted outside of this date range, provide the most recent emissions test. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. List: Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (*e.g.*, before or after emission unit or air pollution control device), and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with Illinois EPA.

- b. Copies: Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
6. Provide copies of all quarterly reports, semi-annual compliance reports, deviation reports, or equivalent documents submitted to Illinois EPA or EPA for the Facility since January 2014.
7. Provide a list of emission units and their associated air pollution control equipment at the Facility. For each piece of air pollution control equipment, provide the date (year) of startup and the compound-specific control efficiency of the unit. Document the basis of the control efficiency (e.g., engineering calculations or performance tests).
8. Provide the date and duration of each pressure relief valve (PRV) release from December 1, 2017 to the present. For each release, provide the estimated release of VOMs and individual HAP in pounds.
9. Provide manufacturers' specifications of the PRVs, including pressure setting and estimated leak rates based on tank pressure.
10. Provide an electronic spreadsheet with the following information for the VS and the BAS located at the Facility from January 2014 to the present:
 - a. The VS and BAS ID;
 - b. The emission units routed to the VS and the BAS;
 - c. The operating parameter(s) monitored at the VS and the BAS for environmental compliance;
 - d. The operating parameter range established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
 - e. The monitored operating parameter data;
 - f. The corrective action taken for each deviation from compliant/normal operating conditions and parameters for the VS and the BAS;
 - g. The date and duration of all VS and BAS shutdowns when the associated emission units are in operation, as well as an annual total (in hours) for each calendar year; and
 - h. Provide a narrative of how emissions ducted to the VS and the BAS are handled in the event of a VS and/or a BAS shutdown.

Appendix D

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendices B and C, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Jim Evans
Koppers, Inc., Galesburg Division
1291 Illinois Route 41
Galesburg, IL 61401

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Julie Armitage, Chief
Bureau of Air, Compliance Unit
Illinois Environmental Protection Agency
Julie.Armitage@Illinois.gov

On the 28th day of February 2018.



Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7017 0530 0000 6289 2211